

REMARKS

Reconsideration and allowance of the subject application are respectfully requested. Applicants have carefully considered the Final Office Action issued May 7, 2003 in the above-titled matter. Claims 1-13, 16-18 and 22-43 are pending.

Claims 1, 5, 7, 8, 10-13, 17, 18, and 24 were rejected under 35 U.S.C. 103(a) as being unpatentable over Carbonell et al (WO 94/06086) in view of Trados Translator's Workbench for Windows. The rejection is respectfully traversed.

Claim 1 recites comparing the input source information with stored source information, said stored source information corresponding to stored target information, identifying an element as a source placeable element, converting at least a portion of the source placeable element into a target placeable element and providing target information comprising automatically inserting the target placeable element into at least a portion of the stored target information, based on the step of comparing.

The Office Action admits that Carbonell fails to teach or suggest comparing the input source information with stored source information or providing target information comprising automatically inserting the target placeable element into at least a portion of the stored target information, based on the step of comparing as recited in claim 1. The Office Action relies on Trados to make up for the deficits of Carbonell.

The Office Action asserts that Trados teaches "a fuzzy match or perfect match between a resizing segment in the source language and target segment in the translation

memory and the insertion of the translation into the target field.” See Office Action dated May 7, 2003 at page 3.

However, this assertion, even if true, does not teach or suggest the claim 1 invention. The Office Action asserts that Trados teaches a “fuzzy match” between a “segment in the *source language*” and a “*target segment* in the translation memory”. However, even if this were correct, Trados does not teach or suggest comparing the input source information with stored *source information* as recited in claim 1. Therefore, neither Carbonell nor Trados, either alone or in combination, teach or suggest the present invention.

Claim 17 recites a computer driven language processing system wherein an element identifier identifies an element as a source placeable element and wherein a placeable converter converts at least a portion of the source placeable element into a target placeable element to provide target information by automatically inserting the target placeable element into at least a portion of stored target information.

Carbonell discloses identifying text by the presence of adjacent SGML tags and the Office Action asserts that Trados discloses a fuzzy match between input source information and stored target information. However, neither Carbonell nor Trados, either alone or in combination teach or suggest a system wherein an element identifier identifies an element as a source placeable element and wherein a placeable converter converts at least a portion of the source placeable element into a target placeable element to provide target information by automatically inserting the target placeable element into at least a

portion of *stored target information*. Therefore, it is respectfully submitted that the rejection be withdrawn.

Claim 18 recites a computer driven language processing system comprising an element identifier identifying placeable elements and a placeable converter for converting at least a portion of the placeable element into a target placeable element to provide target information by automatically inserting the target placeable element into at least a portion of stored target information.

Carbonell discloses identifying text by the presence of adjacent SGML tags and the Office Action asserts that Trados discloses fuzzy matches. However, neither Carbonell nor Trados, either alone or in combination teach or suggest a computer driven language processing system comprising an element identifier identifying placeable elements and a placeable converter for converting at least a portion of the placeable element into a target placeable element to provide target information by automatically inserting the target placeable element into at least a portion of stored target information. Therefore, it is respectfully submitted that the rejection should be withdrawn.

Claim 24 recites a method for processing source information comprising comparing the input source information with stored source information, the stored source information corresponding to stored target information; identifying a source placeable element, calculating at least a portion of the source placeable element into a target placeable element, and providing target information comprising at least a portion of said stored target information and said target placeable element, based on the step of comparing.

Carbonell discloses identifying text by the presence of adjacent SGML tags and the Office Action asserts that Trados discloses fuzzy matches. However, neither Carbonell nor Trados, either alone or in combination teach or suggest a method for processing source information comprising comparing the input source information with stored source information, the stored source information corresponding to stored target information; identifying a source placeable element, calculating at least a portion of the source placeable element into a target placeable element, and providing target information comprising at least a portion of said stored target information and said target placeable element, based on the step of comparing. Therefore, it is respectfully submitted that the rejection should be withdrawn.

Claims 5, 7, 8, 10-13 depend from independent claim 1 and are therefore allowable for at least the reasons cited for claim 1. Thus, it is respectfully submitted that the rejection of claims 1, 5, 7, 8, 10-13, 17, 18 and 24 should be withdrawn.

Claims 2-4, 6 and 9 were rejected under 35 U.S.C. 103(a) as being unpatentable over Carbonell in view of Trados and further in view of Murrow et al (EPO 0668558). This rejection is respectfully traversed.

Claims 2-4, 6 and 9 depend from claim 1. As set forth above, neither Carbonell nor Trados, either alone or in combination, teach or suggest claim 1. Murrow does not make up for the deficiencies of Carbonell and Trados.

Murrow discloses a method of creating localized versions of computer program products (col. 7, lines 30-32) involving internationalizing a computer program, assembling localized portions into coded sections, and creating a localized version of the

computer program which is then installed in the computer (col. 8, lines 27-49). However, Murrow does not teach or suggest comparing the input source information with stored source information, said stored source information corresponding to stored target information, identifying an element as a source placeable element, converting at least a portion of the source placeable element into a target placeable element or providing target information comprising automatically inserting the target placeable element into at least a portion of the stored target information, based on the step of comparing. Neither Carbonell, Trados, or Murrow, either alone or in combination, teach or suggest claim 1. Therefore, the rejection should be withdrawn.

Claims 22 and 23 were rejected under 35 U.S.C. 103(a) as being unpatentable over Carbonell in view of Trados and further in view of Beauregard (U.S. Patent No. 5,974,413). This rejection is respectfully traversed.

Claims 22 and 23 depend from claim 1. As set forth above, neither Carbonell nor Trados, either alone or in combination, teach or suggest claim 1. Beauregard does not make up for the deficiencies of Carbonell and Trados.

Beauregard merely discloses methods involving currency conversion but does not teach or suggest, either alone or in combination with Carbonell and/or Trados, comparing the input source information with stored source information, said stored source information corresponding to stored target information, identifying an element as a source placeable element, converting at least a portion of the source placeable element into a target placeable element or providing target information comprising automatically inserting the target placeable element into at least a portion of the stored target

information, based on the step of comparing. Therefore, it is respectfully requested that the rejection be withdrawn.

Claims 15-24 were rejected "under the same rationale" as claims 1-13 and 16.

This rejection is respectfully traversed.

Claims 15 and 19-21 were cancelled in an amendment filed January 3, 2000.

Claims 17, 18, 22-24, are allowable for at least the reasons set forth above.

Claims 25-43 were rejected under 35 U.S.C. 103(a) as being unpatentable over Carbonell in view of Ravin (U.S. Patent No. 5,819,265). This rejection is respectfully traversed.

Claim 25 recites identifying an element as a source placeable element by predetermined criteria based on the element.

The Office Action admits that Carbonell does not teach or suggest identifying an element based on the element (see Office Action dated January 2, 2003, page 3, lines 6-7) but relies on Ravin to make up for the deficiencies of Carbonell. However, Ravin does not remedy the deficiencies of Carbonell.

Ravin discloses a system that extracts proper names from text to produce a data structure containing names (col. 5, lines 26-29). An authority list is consulted (col. 5, lines 39-40), the authority list containing "special words" (col. 5, line 49) such as "Mr.," "Dr.," "Assistant", "Professor", "Jr.", "Sr.", "Lake", "Mt.", "City", "Inc.", or "Co." (col. 5, lines 43-47). Thus, whereas Carbonell uses SGML tags to identify adjacent elements, Ravin uses "special words" to identify adjacent elements. However, neither Carbonell nor

Ravin teaches or suggests identifying an element as a source placeable element by predetermined criteria *based on the element*. Neither the SGML tag nor the “special word” is the element itself but, rather, both serve as a flag to indicate adjacent elements. Therefore, elements are identified merely based on the presence of adjacent SGML tags (Carbonell) or “special words” (Ravin) and not *based on the element*.

The Office Action asserts that Ravin “extracts proper names”. Even assuming this is true, the proper names extracted are identified by their proximity to “special words”. Thus, Ravin does not teach or suggest identifying an element as a source placeable element by predetermined criteria based on the element as recited in claim 25. Instead, Ravin, at best, identifies an element (i.e., a proper name) based on the presence of an adjacent “special word”. See Ravin, col. 5, lines 39-55.

The Office Action cites an example disclosed in the Ravin reference at col. 1, lines 10-25. This example highlights one of the differences between Ravin and the present invention. In the Ravin example at col. 1, lines 10-25, the term “Mrs. Candy Hill” is encountered as input text. The machine translation system “should not attempt to look up the translation of ‘candy’ and ‘hill’ ” – col. 1, lines 17-18. Thus, Ravin discloses that the words “candy” and “hill” are not to be translated into the target language (i.e., are identified as source placeable elements). However, Ravin identifies the terms “candy” and “hill” as the elements based solely on the fact that both terms are located next to the term “Mrs.” As Ravin discloses, the system “should translate ‘Mrs.’ to the appropriate personal title in the target language” (col. 1, line 19) (i.e., “Mrs” is not identified as a source placeable element) but preserves “the rest of the name intact” – col. 1, line 20 (i.e.,

“candy hill” is identified as a source placeable element based on the fact that it is located next to the term “Mrs”). In other words, in this example, “candy hill” is identified as a source placeable element based on the presence of the word “Mrs” next to it but not based on predetermined criteria *based on the element*.

The Office Action concludes: “[t]herefore, Ravin et al teach that the identification of the source placeable element such as those in his authority list of terms by predetermined criteria based on the element”. See Office Action at page 7. This statement is erroneous because the elements on Ravin’s “authority list of terms” are not source placeable elements. Therefore, they are not identified as source placeable elements at all. As the example at col. 1 demonstrates, the term “Mrs” is an element on the “authority list of terms” but Ravin discloses a system that translates “Mrs” but only preserves “the rest of the name intact.” Therefore, although one may arguably infer that the “rest of the name” might constitute a source placeable element (i.e., “candy hill”), the word “Mrs” (a term on the “authority list of terms”), being translated into the target language, is not. Thus, Ravin fails to teach or suggest identifying an element as a source placeable element by predetermined criteria based on the element. The rejection should be withdrawn.

Claims 26-38, 41 and 42 depend from claim 25 and are allowable for at least the reasons set forth above for claim 25.

Independent claim 39 recites that an element identifier identifies an element as a source placeable element by predetermined criteria based on the element. Independent claim 40 recites an element identifier identifying placeable elements by a predetermined criteria based on the elements. Independent claim 43 recites identifying a source placeable

Serial Number 09/071,900

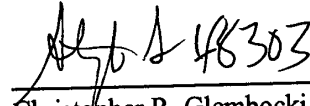
Atty Docket No: 4832.00022

element by predetermined criteria based on the source placeable element. Independent claims 39, 40 and 43 are similar to claim 25 and are allowable for at least the reasons set forth above for claim 25.

In view of the above, it is respectfully submitted that the application is in condition for allowance. Reconsideration and prompt allowance are respectfully requested. If the Examiner feels that a telephone interview would be helpful in facilitating prosecution of the case, the Examiner is respectfully requested to contact the undersigned attorney of record to discuss the application.

Respectfully submitted,

By:


Christopher R. Glembocki
Registration No. 38,800

BANNER & WITCOFF, LTD.
1001 G Street, N.W., 11th Floor
Washington, D.C. 20001
(202) 508-9100

Dated: October 7, 2003